

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

**NAKALA MURRY, INDIVIDUALLY AND
ON BEHALF OF HER SON, A.M., A MINOR**

PLAINTIFF

V.

CAUSE NO.: 4:23CV97-NBB-DAS

CITY OF INDIANOLA, MISSISSIPPI, et al.

DEFENDANTS

MOTION TO AMEND COMPLAINT

COME NOW, Plaintiff Nakala Murry, Individually and on Behalf of her son, A.M., a Minor, (“Plaintiffs”), by counsel, and files this, her *Motion to Amend Complaint*, and would show unto the Court, the following:

1. Plaintiff filed her original complaint on May 30th, 2023.
2. Plaintiff moves to add two additional sentences to more properly plead “Monell” claims.
The additional sentence can be found in paragraph 22 and 24.
3. The proposed amended complaint, which is attached, is based on the additional sentences.
(See Exhibit A, Amended Complaint)
4. This amendment will not warrant additional time for discovery in this case.
5. Pursuant to Federal Rules of Civil Procedure, 15 (a)(2), leave shall be freely given when justice so requires. A party shall plead in response to an amended pleading within the time remaining for response to the original pleading or within ten days after service of the amended pleading, whichever period may be longer unless the court otherwise orders.
6. Defendant’s Counsel has been queried but has indicated no response to the motion.

7. Because of the simplicity of this motion, Plaintiff ask that the memorandum requirement be waived.
8. Based upon the foregoing, Plaintiff prays that this Honorable Court will grant this Motion to Amend Complaint, based upon the reasons, logic, and law set forth herein, and because justice so requires. Plaintiff also prays for all other general relief this Honorable Court deems to be fair and just.

Respectfully submitted, this the 10th day of April, 2024.

**NAKALA MURRY, Individually and on Behalf
of her Son, A.M., a Minor, PLAINTIFFS**

**By: /s/ Carlos E. Moore
Carlos E. Moore, MSB#100685**

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have this date served via the electronic filing system, emailed and/or mailed via U.S. Mail, postage pre-paid, a true and correct copy of the above and foregoing to the following:

Daniel J. Griffith MS Bar No. 8366
M. McKenzie W. Price. MS Bar No 106538
Mary McKay Griffith, MS Bar No. 100785
JACKS | GRIFFITH | LUCIANO, P.A.
P.O Box 1209
Attorneys for Defendants

THIS, the 10th day of April, 2024

/s/ Carlos E. Moore
CARLOS E. MOORE, ESQ.